

1 ELIZABETH J. LOW (SBN 308098)
2 *ELow@goodwinlaw.com*
3 **GOODWIN PROCTER LLP**
4 601 Marshall Street
5 Redwood City, CA 94063
6 Tel.: +1 650 752 3100
7 Fax: +1 650 853 1038

8 Attorney for Defendant
9 Select Portfolio Servicing, Inc.

10 *Additional counsel listed below*

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13 SACRAMENTO DIVISION

14 VERONICA PEREZ, individually and on
15 behalf of all others similarly situated,

16 Plaintiff,

17 v.

18 SELECT PORTFOLIO SERVICING, INC.,

19 Defendant.

Case No. 2:22-cv-01942-TLN-DB

**STIPULATION FOR EXTENSION OF
TIME AND ORDER**

Pursuant to Civil Local Rule 144(a), Plaintiff Veronica Perez (“Plaintiff”) and Defendant Select Portfolio Servicing, Inc. (“Defendant”) (together, the “Parties”), by and through their respective attorneys, stipulate as follows:

WHEREAS, Plaintiff filed her Complaint on October 27, 2022 (*see* Dkt. No. 1);

WHEREAS, Plaintiff served the Complaint on Defendant on October 28, 2022 (*see* Dkt. No. 5);

WHEREAS, the current deadline for Defendant’s response to the Complaint is November 18, 2022;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, subject to the Court’s approval:

1. The deadline for Defendant to answer, move, or otherwise respond to the Complaint shall be extended through and including January 27, 2023;
2. In the event that Defendant files a motion in response to the Complaint, Plaintiff shall file any opposition to the motion by not later than March 3, 2023; and
3. Defendant shall file any reply to the opposition by not later than March 24, 2023.

This is the Parties’ first request for an extension of time.

IT IS SO STIPULATED.

//

//

//

//

//

//

//

//

//

1 Dated: November 16, 2022

Respectfully submitted,

2 By: /s/ Elizabeth J. Low

3 ELIZABETH J. LOW

4 GOODWIN PROCTER LLP

Attorney for Defendant Select Portfolio Servicing, Inc.

5
6 Dated: November 16, 2022

Respectfully submitted,

7
8 By: /s/ Joel D. Smith (as authorized on 11/15/2022)

L. TIMOTHY FISHER (SBN 191626)

9 JOEL D. SMITH (SBN 244902)

BURSOR & FISHER, P.A.

10 1990 North California Boulevard, Suite 940

Walnut Creek, CA 94596

11 Tel.: (925) 300-4455

12 Fax: (925) 407-2700

ltfisher@bursor.com

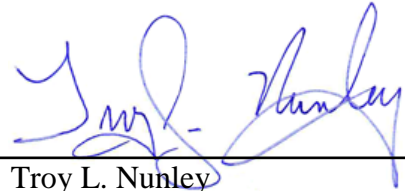
13 jsmith@bursor.com

14 Attorneys for Plaintiff Veronica Perez

15
16
17 **ORDER**

18 **IT IS SO ORDERED.**

19 Dated: November 16, 2022

20 

Troy L. Nunley

21 United States District Judge